



U.S. Department of Justice

*United States Attorney's Office
Eastern District of New York*

271 Cadman Plaza East
Brooklyn, New York 11201

March 12, 2018

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. State of New York, 13-cv-4165 (NGG)
O'Toole et al. v. Cuomo et al., 13-cv-4166 (NGG)

Dear Judge Garaufis:

On behalf of all parties to the above referenced actions, the United States respectfully submits the attached proposed Supplement to the Second Amended Stipulation and Order in the above referenced action. This Supplement provides for numerous changes to the current process for transitioning individuals with serious mental illness from adult homes to community placements and reflects almost twelve months of carefully considered and intensive negotiations to improve the assessment and transition processes.

The parties are available, as always, to answer any questions the Court may have, including whether there is a need for a fairness hearing before the Court so orders the Supplement.

Respectfully Submitted,

RICHARD P. DONOGHUE
United States Attorney

By: _____/s/_____
Michael J. Goldberger
Chief of Civil Rights, Civil Division
United States Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201
(718) 254-6052
Michael.Goldberger@usdoj.gov

_____/s/_____
Eliza Dermody
Jennifer Bronson
Trial Attorneys
Disability Rights Section
Civil Rights Division
U.S. Department of Justice
(202) 305-0463
Eliza.Dermody@usdoj.gov
Jennifer.Bronson2@usdoj.gov

Cc: All parties (via ECF)

